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JENINE BLACKWELL

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

(Camden Vicinage)

RENEE BLACKWELL, : CIVIL ACTION
Plaintiff :

vs :

STATE OF NEW JERSEY :

and :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FAMILIES, :

DIVISION OF YOUTH AND :

FAMILY SERVICES :

and :

CHRISTINE MOZES, :

INDIVIDUALLY AND IN HER :

OFFICIAL CAPACITY AS :

DIRECTOR OF DIVISION OF :

YOUTH AND FAMILY SERVICES :

and :

KIMBERLY RICKETT [sic], :

INDIVIDUALLY AND IN HER :

OFFICIAL CAPACITY AS :

COMMISSIONER OF NEW JERSEY :

DEPARTMENT OF CHILDREN AND :

FAMILIES :

and :

DOLORES HELB, INDIVIDUALLY :

AND IN HER OFFICIAL :

CAPACITY AS AN EMPLOYEE OF :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FAMILIES :

and :

DEBRA BOEHME, INDIVIDUALLY :

AND IN HER OFFICIAL :

CAPACITY AS AN EMPLOYEE OF :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FAMILIES :

and :

<p>2</p> <p>1 JENINE BLACKWELL</p> <p>2 BARBARA PARNES, :</p> <p>3 INDIVIDUALLY AND IN HER :</p> <p>4 OFFICIAL CAPACITY AS AN :</p> <p>5 EMPLOYEE OF NEW JERSEY :</p> <p>6 DEPARTMENT OF CHILDREN :</p> <p>7 AND FAMILIES :</p> <p>8 and :</p> <p>9 JOHN DOES 1-10, :</p> <p>10 Defendant s : NO. 3:09-CV-03004</p> <p>11 Oral deposition of JENINE BLACKWELL,</p> <p>12 taken at the law offices of Weisberg Law, P.C.,</p> <p>13 7 South Morton Avenue, Morton, Pennsylvania, on</p> <p>14 Thursday, March 11, 2010, beginning at</p> <p>15 11:00 a.m. before Judi Y. Olsen, Registered</p> <p>16 Professional Reporter and Notary Public.</p> <p>17 APPEARANCES:</p> <p>18 WEISBERG LAW, P.C.</p> <p>19 BY: GRAHAM F. BAIRD, ESQUIRE</p> <p>20 7 South Morton Avenue</p> <p>21 Morton, Pennsylvania 19070</p> <p>22 (610) 690-0801</p> <p>23 gbaird@weisberglawoffices.com</p> <p>24</p> <p>25 -- Representing the Plaintiff</p>	<p>4</p> <p>1 JENINE BLACKWELL</p> <p>2 I N D E X</p> <p>3 WITNESS: Jenine Blackwell</p> <p>4 QUESTIONED BY: PAGE</p> <p>5 Ms. Jordan 8</p> <p>6 Mr. Mikulski 25</p> <p>7 Mr. Baird 35</p> <p>8</p> <p>9 E X H I B I T S</p> <p>10 MARKED</p> <p>11 NUMBER DESCRIPTION FOR ID</p> <p>12 JB-1 Letter from 26</p> <p>13 Dolores Helb to</p> <p>14 Ms. Jennine [sic]</p> <p>15 Blackwell, dated</p> <p>16 12-01-08</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>3</p> <p>1 JENINE BLACKWELL</p> <p>2 APPEARANCES (continued):</p> <p>3 STATE OF NEW JERSEY</p> <p>4 DEPARTMENT OF LAW & PUBLIC SAFETY</p> <p>5 DIVISION OF LAW</p> <p>6 BY: KAREN L. JORDAN, ESQUIRE</p> <p>7 Section Chief, Tort Litigation Section</p> <p>8 R.J. Hughes Justice Complex</p> <p>9 25 Market Street</p> <p>10 Trenton, New Jersey 08625-0116</p> <p>11 (609) 984-2924</p> <p>12 Karen.Jordan@dol.lps.state.nj.us</p> <p>13</p> <p>14 -- Representing the Defendants,</p> <p>15 State of New Jersey; New Jersey</p> <p>16 Department of Children and Families,</p> <p>17 Division of Youth and Family</p> <p>18 Services; Christine Mozes; Kimberly</p> <p>19 Ricketts; Debra Boehme; Barbara</p> <p>20 Parnes; and John Does 1-10</p> <p>21</p> <p>22 CONNOR, WEBER & OBERLIES</p> <p>23 BY: MICHAEL S. MIKULSKI, II, ESQUIRE</p> <p>24 236 West Route 38, Suite 200</p> <p>25 Moorestown, New Jersey 08057</p> <p>(856) 780-3800</p> <p>mmikulski@cwolaw.com</p> <p>-- Representing the Defendant,</p> <p>Dolores Helb</p> <p>ALSO PRESENT:</p> <p>Renee Blackwell</p> <p>* * *</p>	<p>5</p> <p>1 JENINE BLACKWELL</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 INSTRUCTIONS NOT TO ANSWER:</p> <p>4 Page Line</p> <p>5 (None)</p> <p>6 REQUEST FOR PRODUCTION:</p> <p>7 Page Line Description</p> <p>8 (None)</p> <p>9</p> <p>10 STIPULATIONS:</p> <p>11 Page Line</p> <p>12 6 2-8</p> <p>13 QUESTIONS MARKED:</p> <p>14 Page Line</p> <p>15 (None)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

2 (Pages 2 to 5)

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<p style="text-align: right;">6</p> <p>1 JENINE BLACKWELL</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and among counsel for the</p> <p>4 respective parties that sealing,</p> <p>5 certification, and filing are waived</p> <p>6 and that all objections, except as to</p> <p>7 the form of the question, be reserved</p> <p>8 until the time of trial.)</p> <p>9 MR. BAIRD: Jenine, my name is</p> <p>10 Graham Baird, and I represent your mom,</p> <p>11 Renee, in a lawsuit that she's brought</p> <p>12 against the State of New Jersey.</p> <p>13 We -- the attorneys were just</p> <p>14 having a conversation in the room about</p> <p>15 reading and signing. As you can see,</p> <p>16 the court reporter is taking down</p> <p>17 your -- everything that I've been</p> <p>18 saying so far, and she's also going to</p> <p>19 be recording what you say. Okay?</p> <p>20 After she's done recording it,</p> <p>21 in a couple weeks, she will prepare a</p> <p>22 transcript of everything that has been</p> <p>23 said in this room. Okay?</p> <p>24 THE WITNESS: Uh-huh.</p> <p>25 MR. BAIRD: You were just sworn</p>	<p style="text-align: right;">8</p> <p>1 JENINE BLACKWELL</p> <p>2 some other error in -- in what you</p> <p>3 said. And then at the end, you sign it</p> <p>4 to verify that the transcript is true</p> <p>5 and correct.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MR. BAIRD: The other attorneys</p> <p>8 in the room now will have some</p> <p>9 instructions and questions for you as</p> <p>10 well.</p> <p>11 JENINE BLACKWELL, after having</p> <p>12 been first duly sworn, was examined and</p> <p>13 testified as follows:</p> <p>14 * * *</p> <p>15 EXAMINATION</p> <p>16 * * *</p> <p>17 BY MS. JORDAN:</p> <p>18 Q. My name is Karen Jordan. I'm</p> <p>19 the Deputy Attorney General, and I represent</p> <p>20 the State defendants in this lawsuit.</p> <p>21 A. Uh-huh.</p> <p>22 Q. This is a lawsuit by your mother</p> <p>23 against the State about her biological</p> <p>24 daughter's attempts to contact her --</p> <p>25 A. Uh-huh.</p>
<p style="text-align: right;">7</p> <p>1 JENINE BLACKWELL</p> <p>2 in under oath, and while there is no</p> <p>3 jury or judge in the room, anything</p> <p>4 that you say is under oath, and it</p> <p>5 can -- it has the same force and effect</p> <p>6 as if you were testifying before a</p> <p>7 judge. Okay?</p> <p>8 We were talking about reading</p> <p>9 and signing. After she -- after the</p> <p>10 court reporter prepares the transcript,</p> <p>11 you will have the opportunity to review</p> <p>12 the transcript to make sure that</p> <p>13 everything you said in the transcript</p> <p>14 is the truth to the best of your</p> <p>15 knowledge. Okay?</p> <p>16 And, then, at the end of the</p> <p>17 transcript, you will be presented with</p> <p>18 an errata sheet and a signature page.</p> <p>19 And, basically, it will have lines on</p> <p>20 it where you can -- if you find errors</p> <p>21 in the transcript that you want to</p> <p>22 change --</p> <p>23 THE WITNESS: Oh, okay.</p> <p>24 MR. BAIRD: -- you can write in</p> <p>25 what -- either a typographical error or</p>	<p style="text-align: right;">9</p> <p>1 JENINE BLACKWELL</p> <p>2 Q. -- and the rest of the family.</p> <p>3 A. Uh-huh.</p> <p>4 Q. So I'll be asking you questions</p> <p>5 about what you may know about the facts in the</p> <p>6 case.</p> <p>7 A. Okay.</p> <p>8 Q. Your testimony is under oath.</p> <p>9 It has the same force and effect as if you were</p> <p>10 in a courtroom, and your deposition can be used</p> <p>11 later in the case. It's your sworn testimony,</p> <p>12 and that is why it's important to review the</p> <p>13 transcript and make sure it's -- your testimony</p> <p>14 is correct.</p> <p>15 A. Okay.</p> <p>16 Q. If you don't understand any</p> <p>17 questions that I ask you, please tell me that,</p> <p>18 and I'll rephrase them.</p> <p>19 A. Okay.</p> <p>20 Q. If you don't hear me, please</p> <p>21 tell me that, and I'll speak up.</p> <p>22 If you go ahead and answer the</p> <p>23 question, it will be assumed that you did</p> <p>24 understand it and hear it --</p> <p>25 A. Okay.</p>

3 (Pages 6 to 9)

<p style="text-align: right;">10</p> <p>1 JENINE BLACKWELL</p> <p>2 Q. -- and were answering it.</p> <p>3 If you -- if you don't know an</p> <p>4 answer but you can reasonably estimate the</p> <p>5 answer, I would like you to do that. But</p> <p>6 please don't guess or speculate. If you just</p> <p>7 don't know, tell me that.</p> <p>8 And all your answers do have to</p> <p>9 be audible. They have to be out loud, because</p> <p>10 the court reporter can't take -- take down nods</p> <p>11 or --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- you know, shakes of your</p> <p>14 head.</p> <p>15 A. Yes.</p> <p>16 Q. Okay. I'm going to go ahead and</p> <p>17 start the deposition now.</p> <p>18 When did you first learn that</p> <p>19 your adopted sibling was looking for her</p> <p>20 family?</p> <p>21 A. December of '08. I don't know</p> <p>22 the -- I don't remember the specific day. I</p> <p>23 got the mail.</p> <p>24 Q. And how did that happen?</p> <p>25 A. I had a letter in the mail --</p>	<p style="text-align: right;">12</p> <p>1 JENINE BLACKWELL</p> <p>2 Q. -- manage to get everything</p> <p>3 down.</p> <p>4 A. Excuse me. Sorry.</p> <p>5 Q. You didn't know.</p> <p>6 A. Okay.</p> <p>7 Q. When you're -- you're saying, "a</p> <p>8 sibling of Renee Blackwell." A sibling is a</p> <p>9 sister or brother. Do you mean to say a child</p> <p>10 or your sibling?</p> <p>11 A. I mean to say what the letter</p> <p>12 said. I can't specify what -- what term --</p> <p>13 what person they were naming in that phrase --</p> <p>14 Q. Okay.</p> <p>15 A. -- but they used sibling or kin</p> <p>16 in the letter. Now, I'm not too sure if they</p> <p>17 were talking of her relatives or -- or -- I</p> <p>18 don't -- they sent me the letter. So I'm</p> <p>19 thinking the State knows who they're sending</p> <p>20 the letter to.</p> <p>21 Q. What did you do when you got the</p> <p>22 letter?</p> <p>23 A. Nothing. Just read it.</p> <p>24 Q. Did you pick any of the options</p> <p>25 in the letter?</p>
<p style="text-align: right;">11</p> <p>1 JENINE BLACKWELL</p> <p>2 Q. Who was --</p> <p>3 A. -- from the State.</p> <p>4 Q. Okay.</p> <p>5 A. The State agency name, I don't</p> <p>6 remember.</p> <p>7 Q. And what did the letter say?</p> <p>8 A. A sibling of Renee Blackwell, I</p> <p>9 believe, was trying to contact me. And it gave</p> <p>10 me options as to how to give that -- how to</p> <p>11 have her contact me, whether it be address,</p> <p>12 phone number, both, or nothing at all. I</p> <p>13 believe they were options.</p> <p>14 I don't know the base of</p> <p>15 everything the letter stated. I don't remember</p> <p>16 that. But it did say that a sibling of Renee</p> <p>17 Blackwell was trying to contact me.</p> <p>18 Q. Now, you're saying, "a sibling</p> <p>19 of Renee Blackwell." Was it --</p> <p>20 A. Or kin.</p> <p>21 Q. -- your sibling?</p> <p>22 Oh, that's another thing I</p> <p>23 didn't say. If we're both talking, the court</p> <p>24 reporter can't --</p> <p>25 A. Okay.</p>	<p style="text-align: right;">13</p> <p>1 JENINE BLACKWELL</p> <p>2 A. Uh-huh. My phone number, my</p> <p>3 cell phone only.</p> <p>4 Q. Did you talk to anyone at the</p> <p>5 State about the letter?</p> <p>6 A. Yes, I did.</p> <p>7 Q. Who was that?</p> <p>8 A. I don't remember her name.</p> <p>9 Q. And when was it?</p> <p>10 A. I would -- I would -- I would</p> <p>11 say the end of December. Yes, I would -- I</p> <p>12 would say the end of December. I don't</p> <p>13 remember the specific date or time in that --</p> <p>14 in that month, but I would say, if not the end</p> <p>15 of December, early January.</p> <p>16 Q. And what was the conversation?</p> <p>17 A. Basically, I sent the</p> <p>18 information, because I really didn't believe,</p> <p>19 you know, the letter. I wanted to make sure</p> <p>20 that was the purpose of the letter. So I</p> <p>21 called the number on the letter. It may have</p> <p>22 been Claire. I'm not sure, so I don't really</p> <p>23 want to give out names.</p> <p>24 But I wanted to make sure that</p> <p>25 that information and what they were sending</p>

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<p style="text-align: right;">14</p> <p>1 JENINE BLACKWELL</p> <p>2 that letter for -- what it was for, and what --</p> <p>3 what -- what was the process/procedure after I</p> <p>4 gave the information on the letter.</p> <p>5 Q. I think you said that you -- you</p> <p>6 didn't trust the letter or something to that</p> <p>7 effect.</p> <p>8 A. No, I didn't say I didn't trust</p> <p>9 it. I said I wanted to make sure that that was</p> <p>10 the purpose of the letter and to find out the</p> <p>11 process after I gave the information on the</p> <p>12 letter. After I gave my cell phone, what</p> <p>13 exactly is the process? Does it go back to the</p> <p>14 State? Does it go to her? I was just finding</p> <p>15 out. I wanted to make sure that everything was</p> <p>16 legitimate.</p> <p>17 Q. Can you tell -- say more about</p> <p>18 what you mean about everything being</p> <p>19 legitimate?</p> <p>20 A. They -- there really wasn't</p> <p>21 anything to expect after I gave that</p> <p>22 information. Who wanted the information? You</p> <p>23 know, I didn't know who I was sending that</p> <p>24 letter to or anything of that nature. So I</p> <p>25 wanted to call and find out who exactly was</p>	<p style="text-align: right;">16</p> <p>1 JENINE BLACKWELL</p> <p>2 Then the one lady that did</p> <p>3 answer the phone told me that she was the only</p> <p>4 one handling all the calls and she was quite</p> <p>5 busy or something and she would try to have</p> <p>6 someone get back to me.</p> <p>7 And then when I called and had</p> <p>8 the initial longer conversation, she -- I told</p> <p>9 her -- she explained to me that my sister</p> <p>10 wasn't able to get through on the phone and</p> <p>11 things of that nature.</p> <p>12 And -- and I told her -- I think</p> <p>13 she either -- I'm not too sure if we exchanged</p> <p>14 phone numbers at that point; I got her</p> <p>15 number -- I think I may have gotten her number,</p> <p>16 or she just tried to call me, or something like</p> <p>17 that. I don't remember how that went.</p> <p>18 Q. And who did she call?</p> <p>19 [REDACTED]</p> <p>20 A. [REDACTED]</p> <p>21 [REDACTED] She couldn't --</p> <p>22 Q. Did she tell you anything about</p> <p>23 her adoption or her birth?</p> <p>24 A. No. The lady on -- no.</p> <p>25 Q. Anything else about Denine?</p>
<p style="text-align: right;">15</p> <p>1 JENINE BLACKWELL</p> <p>2 handling the case, I guess, and what was I to</p> <p>3 expect after I did what I did?</p> <p>4 Q. Okay. I understand. Is that</p> <p>5 what you discussed with the person on the</p> <p>6 phone --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- the person at the State?</p> <p>9 A. Yes.</p> <p>10 Q. And what -- what did they tell</p> <p>11 you?</p> <p>12 A. They said that my sister</p> <p>13 couldn't get through on my phone.</p> <p>14 Excuse me. I called a couple of</p> <p>15 times on different dates, and I think I left</p> <p>16 messages. It may have been phone tag in the --</p> <p>17 in the span of three days. But I -- I left</p> <p>18 messages.</p> <p>19 I spoke with a lady. The one</p> <p>20 lady had not come back to the office yet, which</p> <p>21 was one of the first phone calls. The one lady</p> <p>22 had not come in. She may have been on</p> <p>23 vacation. I don't remember everything about</p> <p>24 that. But there wasn't a lady -- there was a</p> <p>25 lady that was not there.</p>	<p style="text-align: right;">17</p> <p>1 JENINE BLACKWELL</p> <p>2 A. No. She just said that she was</p> <p>3 trying to call.</p> <p>4 Q. And did you have another</p> <p>5 conversation after that with someone from the</p> <p>6 State?</p> <p>7 A. I don't remember.</p> <p>8 Q. Did you receive any more letters</p> <p>9 from the State?</p> <p>10 A. No.</p> <p>11 Q. Any emails?</p> <p>12 A. They don't have my email</p> <p>13 address, not that I know of.</p> <p>14 Q. And you didn't send any to them?</p> <p>15 A. No, huh-uh.</p> <p>16 Q. Did you send them any letters?</p> <p>17 A. Huh-uh.</p> <p>18 Q. So what happened next, after</p> <p>19 either you gave the State the phone number or</p> <p>20 someone gave Denine the phone number? What</p> <p>21 happened next?</p> <p>22 A. I talked to my sister at that</p> <p>23 point. We were communicating by phone.</p> <p>24 Q. When you say, your sister, you</p> <p>25 mean Denine?</p>

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<p style="text-align: right;">18</p> <p>1 JENINE BLACKWELL</p> <p>2 A. Denine, uh-huh. I'm sorry.</p> <p>3 Q. And when did you first talk to</p> <p>4 her?</p> <p>5 A. I don't remember, but I will say</p> <p>6 either the end of '08 or the beginning of '09.</p> <p>7 Q. Uh-huh.</p> <p>8 A. Sorry I don't have a date. It's</p> <p>9 been a year -- over a year.</p> <p>10 Q. And how often do you see her?</p> <p>11 A. I haven't since Memorial Day</p> <p>12 weekend.</p> <p>13 Q. Okay. How many times did you</p> <p>14 see her between December '08 and Memorial Day?</p> <p>15 A. I'll -- I'll say three.</p> <p>16 Q. Okay. Did you have any</p> <p>17 conversations with your mother about Denine?</p> <p>18 A. Conversation -- at what point?</p> <p>19 Are you talking before I saw my sister?</p> <p>20 Q. Ever.</p> <p>21 A. No, not -- not up until -- not</p> <p>22 before I met my -- known about my sister, no.</p> <p>23 Q. So not before December of '08?</p> <p>24 A. Before the letter came from the</p> <p>25 State, I didn't have any conversation about my</p>	<p style="text-align: right;">20</p> <p>1 JENINE BLACKWELL</p> <p>2 A. Okay.</p> <p>3 Q. Is that the first contact you</p> <p>4 had with your mother --</p> <p>5 A. About that issue?</p> <p>6 Q. -- about it?</p> <p>7 A. I believe so. That's May,</p> <p>8 Memorial Day? To my knowledge, I believe so,</p> <p>9 yes.</p> <p>10 Q. Did you have any phone calls or</p> <p>11 conversations with her before that?</p> <p>12 A. I don't think so. It was kind</p> <p>13 of hard for my mom to talk about it, so I kind</p> <p>14 of just sent the email as, I guess, a way of</p> <p>15 saying, I know about it, and it's no -- it's no</p> <p>16 big deal to me. I mean --</p> <p>17 Q. How did you know it was hard for</p> <p>18 your mom to talk about it?</p> <p>19 A. She was quiet. She -- she knew</p> <p>20 I knew. The State told her, I think, that my</p> <p>21 sister contacted me, and so she knew that I</p> <p>22 knew. So she was quiet about it. She didn't,</p> <p>23 you know, come to me with it. So -- I mean,</p> <p>24 that would be a hard thing to talk about.</p> <p>25 Q. Well, you said you didn't have</p>
<p style="text-align: right;">19</p> <p>1 JENINE BLACKWELL</p> <p>2 sister.</p> <p>3 Q. Okay, okay. How about after the</p> <p>4 letter came? Did you have a conversation with</p> <p>5 your mother?</p> <p>6 A. No. I sent her an email.</p> <p>7 Q. When did you send the email?</p> <p>8 A. Don't remember.</p> <p>9 Q. Did you send it right around</p> <p>10 that time, or was it later?</p> <p>11 A. Nope. It was maybe February or</p> <p>12 March. Maybe. I'm sorry. I don't remember.</p> <p>13 Q. I'm going to show you a string</p> <p>14 of emails that's been marked RB-1 and ask you</p> <p>15 to look at the last page.</p> <p>16 A. This one you want me to look at</p> <p>17 (indicating)?</p> <p>18 Q. Yes.</p> <p>19 A. I'm sorry. Read the whole --</p> <p>20 okay. This section here you want me to read</p> <p>21 (indicating)?</p> <p>22 Q. Yes, ma'am.</p> <p>23 A. Okay, right. I sent my mom an</p> <p>24 email. Okay.</p> <p>25 Q. Yes, this full email.</p>	<p style="text-align: right;">21</p> <p>1 JENINE BLACKWELL</p> <p>2 any discussions at all with her until that</p> <p>3 email.</p> <p>4 A. Uh-huh.</p> <p>5 Q. So I'm trying to understand how</p> <p>6 you knew she was upset --</p> <p>7 A. That's my mom.</p> <p>8 Q. -- how you knew she knew about</p> <p>9 it.</p> <p>10 A. My sister told me. I was</p> <p>11 talking to my sister. This was in May, and I</p> <p>12 was talking to my sister, and I saw my sister</p> <p>13 probably before that email. And so my sister</p> <p>14 explained to me that she went to my mother's</p> <p>15 house.</p> <p>16 Q. Okay. And what did she tell you</p> <p>17 about that?</p> <p>18 A. She said she went there and my</p> <p>19 mom wasn't very receptive.</p> <p>20 Q. What -- what did -- did she tell</p> <p>21 you anything more about that encounter?</p> <p>22 A. (Shakes head.)</p> <p>23 Q. Did she tell you when it was?</p> <p>24 A. I -- I believe it was the</p> <p>25 Saturday before the Tuesday we talked. The day</p>

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22

1 JENINE BLACKWELL

2 of -- the day of -- the month that was, I can't

3 remember. She went down there on a Saturday,

4 because I think I was at Woodbridge Mall when

5 she was in Atlantic City.

6 Q. Do you know what month --

7 A. Actually, you know what? That's

8 all Christmas, because we went to the

9 Woodbridge Mall for Christmas. So I would have

10 been at Woodbridge, and that would have been

11 December that I talked to my sister.

12 Q. Okay. And at that time, she had

13 already been to see your mother --

14 A. Yes.

15 Q. -- at her home?

16 A. Yes.

17 Q. Did she tell you whether she

18 went there alone?

19 A. She went with a boyfriend and

20 another couple in the car.

21 Q. Okay. What was that person's

22 name, the boyfriend?

23 A. Steven is his name.

24 Q. Do you know his last name?

25 A. No, I don't, huh-uh.

23

1 JENINE BLACKWELL

2 Q. Did you ever talk to your mother

3 about it at any time?

4 A. Just saying, again, after I

5 talked to my sister?

6 Q. After, yes.

7 A. I sent the email. My mom -- we

8 might have had one phone call about the whole

9 procedure maybe. Let me just try to think,

10 because I don't want to -- I don't --

11 We might have had one phone

12 call. I really -- yeah, I think it was more

13 about the State than my sister.

14 Q. And what was the -- what was

15 that conversation, your side and her side?

16 What did she say? What did your mom say to

17 you?

18 A. She just said that they really

19 shouldn't have -- I really can't tell you

20 exactly what she said, because that was a long

21 time ago. You said you don't want a

22 guesstimate. Well, she said -- I don't know

23 what to tell you. [REDACTED]

24 [REDACTED]

25 Q. And what did she say about the

24

1 JENINE BLACKWELL

2 State?

3 A. It shouldn't have happened.

4 Q. Did she say anything about how

5 the pregnancy occurred?

6 A. Not to me, no.

7 Q. Okay. Did you ever talk to

8 Denine about what information the State gave

9 her?

10 A. Huh-uh, nope, never asked her.

11 I don't know how she got my mom's address.

12 Q. Do you know anything about a

13 piece of paper with your mom's address on it

14 and the State -- that the State would have

15 given to Denine? Do you know anything about

16 that?

17 A. Huh-uh. I don't know how she

18 got my mom's address. All I know is how she

19 got in contact with me.

20 Q. And how did she do that?

21 A. I gave her my cell

22 phone number.

23 Q. That's right.

24 A. -- that -- we had that phone

25 exchange through the letter. That was all.

25

1 JENINE BLACKWELL

2 That's the only paper I know about.

3 Q. Where were you living at that

4 time?

5 A. I lived at 19-B Franklin Drive,

6 Maple Shade at that time and now.

7 MS. JORDAN: Okay. I think

8 that's all I have, but Mr. Mikulski

9 will have some questions for you.

10 THE WITNESS: Okay.

11 * * *

12 EXAMINATION

13 * * *

14 BY MR. MIKULSKI:

15 Q. Good morning.

16 A. Good morning.

17 Q. My name is Mike Mikulski, and I

18 represent Dolores Helb in this lawsuit.

19 A. Oh, okay.

20 Q. I'm going to show you a

21 document, which we'll mark as --

22 A. Me? Okay.

23 Q. I'll give it -- you -- I'll give

24 it to the court reporter first.

25 A. Okay.

7 (Pages 22 to 25)

<p style="text-align: right;">26</p> <p>1 JENINE BLACKWELL</p> <p>2 Q. I'm sorry.</p> <p>3 MR. MIKULSKI: How about J --</p> <p>4 BY MR. MIKULSKI:</p> <p>5 Q. Jenine, with a J, correct?</p> <p>6 A. J.</p> <p>7 MR. MIKULSKI: -- JB-1.</p> <p>8 * * *</p> <p>9 (Whereupon, Exhibit JB-1 was</p> <p>10 marked for identification.)</p> <p>11 * * *</p> <p>12 MR. MIKULSKI: This was part of</p> <p>13 plaintiff's disclosures.</p> <p>14 MR. BAIRD: Okay.</p> <p>15 BY MR. MIKULSKI:</p> <p>16 Q. Jenine, could you review that</p> <p>17 just for a moment and let me know when you're</p> <p>18 ready to answer a question about it?</p> <p>19 * * *</p> <p>20 (Pause)</p> <p>21 * * *</p> <p>22 A. Okay.</p> <p>23 Q. Is this the letter you received</p> <p>24 from the State that you were talking about</p> <p>25 earlier?</p>	<p style="text-align: right;">28</p> <p>1 JENINE BLACKWELL</p> <p>2 A. -- what conversations I had, but</p> <p>3 I think I did speak to her.</p> <p>4 Q. When you gave them your cell</p> <p>5 phone number, was it -- did you call them to</p> <p>6 give them the number --</p> <p>7 A. No.</p> <p>8 Q. -- or did you send --</p> <p>9 A. I think there is another piece</p> <p>10 of paper that goes with this. But I sent it</p> <p>11 in.</p> <p>12 Q. Okay. Was not a date</p> <p>13 possible in?</p> <p>14 A. Right</p> <p>15 Q. All right.</p> <p>16 A. with the phone number on</p> <p>17 there.</p> <p>18 Q. Is this something yours, where</p> <p>19 it says --</p> <p>20 A. This is mine, gave phone only.</p> <p>21 Q. Okay</p> <p>22 A. I wanted to keep that for</p> <p>23 myself.</p> <p>24 Q. Okay. And do you recall if in</p> <p>25 any of your conversations, they were with</p>
<p style="text-align: right;">27</p> <p>1 JENINE BLACKWELL</p> <p>2 A. Yes.</p> <p>3 Q. And as far as you know, is this</p> <p>4 the only letter you ever received from the</p> <p>5 State?</p> <p>6 A. Yes</p> <p>7 Q. There were these signatures</p> <p>8 at the bottom of Delores Helb. Have you ever</p> <p>9 spoken with her?</p> <p>10 A. I don't know</p> <p>11 Q. Okay.</p> <p>12 A. These are the names that I can</p> <p>13 remember with the phone number. I had -- I</p> <p>14 called the number.</p> <p>15 Q. Okay. Can you tell me what you</p> <p>16 can recall about your conversation with</p> <p>17 Ms. Helb?</p> <p>18 A. I don't think this -- I think</p> <p>19 this was the woman that was not in the office.</p> <p>20 Q. Okay.</p> <p>21 A. And I think someone answered her</p> <p>22 calls. I think I did speak with her, and I</p> <p>23 think that the initial conversation -- again,</p> <p>24 I'm not sure --</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">29</p> <p>1 JENINE BLACKWELL</p> <p>2 Ms. Helb, or do you think it was someone else</p> <p>3 because she wasn't available?</p> <p>4 A. At first, she wasn't available.</p> <p>5 And I do believe I spoke with her, whether I --</p> <p>6 you know, because there are other ladies, and</p> <p>7 someone might have taken the call, and -- if</p> <p>8 they knew about it. But her name was on there,</p> <p>9 so I'm imagining -- or I'm going to say I spoke</p> <p>10 with her at some point.</p> <p>11 Q. Okay. And you -- but you don't</p> <p>12 remember the specifics of that conversation</p> <p>13 with her as opposed to someone else?</p> <p>14 A. No, sir, I don't.</p> <p>15 Q. All right. Is Sean Vernon your</p> <p>16 son?</p> <p>17 A. Uh-huh.</p> <p>18 Q. And -- was that yes?</p> <p>19 A. Yes. I'm sorry. Yes.</p> <p>20 Q. That's okay.</p> <p>21 And has Sean -- I'm going to say</p> <p>22 Sean Vernon just to differentiate from Sean,</p> <p>23 because in writing, it's going to be S-e-a-n</p> <p>24 either way.</p> <p>25 A. Yes.</p>

8 (Pages 26 to 29)

30

1 JENINE BLACKWELL

2 Q. Did Sean Vernon ever tell you

3 that he knew how Denine found your mother?

4 A. No. No, he didn't.

5 Q. Okay. And you have not seen

6 Denine since Memorial Day 2009?

7 A. Seen, no.

8 Q. Have you spoken to her?

9 A. Yes.

10 Q. Okay. Did you go to your

11 brother's candlelight vigil in Atlantic City?

12 A. No, I didn't.

13 Q. Do you know if your son has

14 continued to speak with Denine?

15 A. Yes, he has.

16 Q. Have you had conversations with

17 your son about Denine?

18 A. Uh-huh.

19 Q. And have any --

20 A. Yes.

21 Q. And have any of those

22 conversations involved how Denine found your

23 mother?

24 A. Huh-uh, no, sir, because -- no.

25 No. We haven't -- no, I explained to him who

31

1 JENINE BLACKWELL

2 she was.

3 Q. Okay.

4 A. I thought I told him who she

5 was.

6 Q. Okay.

7 A. Now, whether he knew her before

8 me, I don't know.

9 Q. Have you had any conversations

10 with your grandmother about how Denine found

11 your mother?

12 A. No, not at all.

13 Q. Have you witnessed any emotional

14 or -- or psychological difficulties from your

15 mother because of Denine being back in her

16 life?

17 A. Actually, I have. Some.

18 Q. Can you tell me about those,

19 please?

20 A. I think she feels heavy. I

21 think my mom feels heavy, quite disturbed. And

22 I don't mean violent, in any sense of the word,

23 but I think she's bothered. I really do. And

24 I -- I don't -- you know, at first,

25 embarrassment or shame -- I don't really know

32

1 JENINE BLACKWELL

2 the emotional -- we never spoke about any

3 emotional, but I -- I use -- I'm used to

4 hearing my mom talk, and when she has a certain

5 volume or certain words, then she's upset. So

6 she has been upset.

7 Q. Have you ever seen the Complaint

8 in this lawsuit?

9 A. No. Paper-wise?

10 Q. Yes.

11 A. No.

12 Q. Have you had any conversations

13 with your mother specifically about the

14 lawsuit?

15 A. No. I've told her if I could

16 help her in any way -- I don't have any

17 documents, just the letter I had. I sent her

18 the copy, and that was it.

19 I think she had spoken about the

20 lawyer. And she was on her way here, and

21 something happened with people calling her and

22 not calling her, and she came up here or went

23 somewhere for nothing and -- that was the time

24 she had to come for a meeting.

25 Q. Okay.

33

1 JENINE BLACKWELL

2 A. Other than that --

3 Q. Do you have -- I'm sorry if you

4 answered this already. Do you have any

5 information about how Denine found your

6 mother?

7 A. No, I don't. I thought that

8 came from the State.

9 Q. And can you tell me, what made

10 you think it came from the State?

11 A. Because they sent me a letter.

12 They sent me a letter. I don't know -- I don't

13 know if they just -- I don't really know

14 what -- what the procedure is for the

15 situation, if they contacted my mom and didn't

16 reach her. I don't -- I just assumed. I'm

17 assuming that that's -- that's where it came

18 from. I didn't -- she had already seen my mom

19 when I talked to her.

20 Q. Okay.

21 A. So I don't know where it came

22 the address from, but -- maybe that was a dumb

23 thing to say, but I don't remember --

24 now how she got that address.

25 Q. Denine didn't tell you she was

9 (Pages 30 to 33)

<p style="text-align: right;">34</p> <p>1 JENINE BLACKWELL</p> <p>2 going to your mother's house?</p> <p>3 A. I didn't -- I talked to her</p> <p>4 after. She wouldn't have been able to tell me</p> <p>5 that.</p> <p>6 Q. Okay.</p> <p>7 A. We had a problem communicating.</p> <p>8 As the State worker said, she wasn't able to</p> <p>9 call my phone. Even after we started talking,</p> <p>10 she would say that it was hard to call in to my</p> <p>11 phone. I have MetroPCS. It's not a big name</p> <p>12 everywhere. And for some reason, there were</p> <p>13 some issues with her calling my phone at times.</p> <p>14 I had no problem calling hers.</p> <p>15 By the time we initially talked</p> <p>16 for a length of time -- actually, we talked</p> <p>17 maybe two or three times, and then she told me</p> <p>18 that she went to go see my mother. She</p> <p>19 and my mother and I started</p> <p>20 living.</p> <p>21 Q. My mother and I started</p> <p>22 she found your mother's address.</p> <p>23 A. My mother.</p> <p>24 MR. MIKULSKI: That's all I</p> <p>25 have. Thank you.</p>	<p style="text-align: right;">36</p> <p>1 JENINE BLACKWELL</p> <p>2 week.</p> <p>3 Q. Okay. And do you have</p> <p>4 conversations with Denine about your mom?</p> <p>5 A. Yes, we do.</p> <p>6 Q. Okay. And describe for me</p> <p>7 generally the substance of those conversations.</p> <p>8 A. Well, actually, we joke a lot,</p> <p>9 because she said she reads a lot. Some of her</p> <p>10 gestures when I've been around her are like --</p> <p>11 she reminds me of my mother.</p> <p>12 My mom, yeah, how she's doing;</p> <p>13 is she bitter, and things of that nature; you</p> <p>14 know, how -- how -- how she's doing, and --</p> <p>15 and, you know, how she may feel is what our</p> <p>16 conversations are.</p> <p>17 Q. And have you asked Denine --</p> <p>18 have you talked to Denine about whether she'll</p> <p>19 ever have a relationship with your mom?</p> <p>20 A. Yes, I have.</p> <p>21 Q. Have you tried to facilitate a</p> <p>22 relationship in any way?</p> <p>23 A. No. I'm not -- I'm not getting</p> <p>24 involved in -- in mending -- it would be nice,</p> <p>25 but that was kind of a last -- you know, her --</p>
<p style="text-align: right;">35</p> <p>1 JENINE BLACKWELL</p> <p>2 MR. BAIRD: I've just got --</p> <p>3 I've just got a couple.</p> <p>4 * * *</p> <p>5 EXAMINATION</p> <p>6 * * *</p> <p>7 BY MR. BAIRD:</p> <p>8 Q. Did Denine ever tell you about</p> <p>9 how she came to find your mom?</p> <p>10 A. I don't believe so.</p> <p>11 Q. Okay.</p> <p>12 A. I don't -- I don't believe so.</p> <p>13 Q. About how often do you talk to</p> <p>14 Denine?</p> <p>15 A. We just started talking since my</p> <p>16 brother passed. We hadn't talked for awhile</p> <p>17 before then. I mean, I've been talking to her</p> <p>18 recent. I -- I call her. I call her. We may</p> <p>19 talk, and then I don't talk to her for a week</p> <p>20 or two or three days. It's not like an</p> <p>21 all-day, everyday thing. I don't talk to</p> <p>22 her -- I hope I'm being clear.</p> <p>23 Q. Just -- just how -- how often,</p> <p>24 if you can estimate for me?</p> <p>25 A. Two or three days out of the</p>	<p style="text-align: right;">37</p> <p>1 JENINE BLACKWELL</p> <p>2 facilitate? No, I haven't.</p> <p>3 Q. Okay.</p> <p>4 A. No.</p> <p>5 Q. How often do you talk to your</p> <p>6 mom?</p> <p>7 A. Enough. Is that a word -- not</p> <p>8 an answer?</p> <p>9 Q. Okay.</p> <p>10 A. Enough, I guess. Four to five</p> <p>11 days out of the week. Is that --</p> <p>12 Q. Okay, okay. Do you ever talk</p> <p>13 about Denine?</p> <p>14 A. Huh-uh.</p> <p>15 Q. Okay.</p> <p>16 A. No, sir.</p> <p>17 Q. All right. One</p> <p>18 time I've talked to Denine.</p> <p>19 the letter for</p> <p>20 A. My mother.</p> <p>21 Q. All right.</p> <p>22 A. No knowledge at all at any time</p> <p>23 from any of my family members.</p> <p>24 Q. Okay. Did you ever have any</p> <p>25 conversations about Denine with your late</p>

10 (Pages 34 to 37)

<p style="text-align: right;">38</p> <p>1 JENINE BLACKWELL</p> <p>2 brother?</p> <p>3 A. Yes, I did. I told my</p> <p>4 brother -- oh, yes, I did. I told him -- yes.</p> <p>5 He didn't get a letter, and I told him on the</p> <p>6 phone. And he was quite funny, thinking she</p> <p>7 was after our money. And we talked, and he</p> <p>8 said that he would get an investigator to check</p> <p>9 it all out and all that stuff. So we did talk</p> <p>10 about her, yes.</p> <p>11 Q. Did -- to your knowledge, did he</p> <p>12 ever get an investigator?</p> <p>13 A. He may have had a friend, but --</p> <p>14 I mean, as far as us going to talk to somebody,</p> <p>15 you know, making it official, that was just a</p> <p>16 joke. But he may have -- I don't think he did,</p> <p>17 no.</p> <p>18 Q. And did you ever talk to Denine</p> <p>19 where your mom lived?</p> <p>20 A. She already knew. She told</p> <p>21 me -- she told me where she -- I really didn't</p> <p>22 believe she was there. I said, well, where --</p> <p>23 did you go to the house with the gray stuff on</p> <p>24 it? And she said, yeah, with the one step. So</p> <p>25 she already knew where she lived. Or the two</p>	<p style="text-align: right;">40</p> <p>1 JENINE BLACKWELL</p> <p>2 work very briefly, because I was at work. And</p> <p>3 I don't remember the specific day, but I was at</p> <p>4 work. I don't know what day of the week it was</p> <p>5 or what day of the month. I'm sorry. I</p> <p>6 don't --</p> <p>7 Q. Do you know which month it was?</p> <p>8 A. It was in December</p> <p>9 December of 2008?</p> <p>10 A. Yes.</p> <p>11 Q. And how long did it take you to</p> <p>12 contact your mother after you contacted -- you</p> <p>13 were contacted by Denine?</p> <p>14 A. I guess -- it would have been</p> <p>15 five months, I guess.</p> <p>16 Q. So you did not speak with your</p> <p>17 mom or --</p> <p>18 A. I didn't bring that up, sir. I</p> <p>19 understood that my mom was feeling some kind of</p> <p>20 way. I -- that could be assumption. You can</p> <p>21 call it what you want. That's my mother, and I</p> <p>22 know my mom. And she knew I knew, I'm going to</p> <p>23 say right now. We didn't even talk about the</p> <p>24 knowing of it, but she knew that I knew about</p> <p>25 it.</p>
<p style="text-align: right;">39</p> <p>1 JENINE BLACKWELL</p> <p>2 steps, whatever is there.</p> <p>3 Q. Was your brother's last name</p> <p>4 Blackwell?</p> <p>5 A. Yes, it is -- yes, it was.</p> <p>6 Q. Okay. Do you know why he never</p> <p>7 received a letter?</p> <p>8 A. No, I don't. He knew -- he</p> <p>9 didn't know about Denine until I told him. So</p> <p>10 he didn't get a letter. And if that would</p> <p>11 be -- that would be because of the mail -- or</p> <p>12 at that time, maybe they were sending out</p> <p>13 depending on his living situation. I'm not too</p> <p>14 sure.</p> <p>15 Q. And can you remember the</p> <p>16 specific date when you first</p> <p>17 with Denine.</p> <p>18 A. Met with?</p> <p>19 Q. Spoke with, your first contact</p> <p>20 with her --</p> <p>21 A. That was at work.</p> <p>22 Q. -- a specific date.</p> <p>23 A. That was at work, the same --</p> <p>24 the last conversation -- that was at work.</p> <p>25 That -- the first time I talked to her was at</p>	<p style="text-align: right;">41</p> <p>1 JENINE BLACKWELL</p> <p>2 And so I guess she was just --</p> <p>3 you know, it was a hard situation to talk</p> <p>4 about. At times, she said that she wanted to</p> <p>5 talk to me about something, and she didn't</p> <p>6 really -- she didn't -- she didn't even -- so I</p> <p>7 just sent the email.</p> <p>8 Q. Okay. I understand that.</p> <p>9 A. I just sent the email.</p> <p>10 Q. How do you know that your mom</p> <p>11 knew about it? There is an unspoken</p> <p>12 understanding that you're referring to.</p> <p>13 A. I think one of the</p> <p>14 conversations -- not think. I believe one of</p> <p>15 the ladies at the State had told me --</p> <p>16 Oh, okay. Yeah. My mom called</p> <p>17 them. My mom called the State because she was</p> <p>18 upset, and she was talking to them, and -- she</p> <p>19 was talking -- I don't know -- but she had --</p> <p>20 she called the state, and my sister -- I was</p> <p>21 calling the State to find out where my -- what</p> <p>22 was going on with my sister calling.</p> <p>23 And so that's what happened. I</p> <p>24 don't -- she was calling them to complain, and</p> <p>25 I was calling them to find out about the letter</p>

11 (Pages 38 to 41)

42

44

1 JENINE BLACKWELL
 2 that I received and what was taking so long for
 3 her to contact me.
 4 Q. And how did you know that your
 5 mom was contacting the State?
 6 A. The lady told me, I believe.
 7 Q. And when you refer to "the
 8 lady," who are you talking about?
 9 A. One of the ladies that I talked
 10 to. I'm trying to remember. I don't want to
 11 say anything wrong.
 12 My mom didn't tell me she called
 13 the State, no. One of the ladies did. One of
 14 the ladies had -- yeah. I'm guessing that the
 15 ladies had already -- my mom had already talked
 16 to the ladies or whoever it was and expressed
 17 her disagreement.
 18 And in that process, when I was
 19 calling them to get the number, maybe they were
 20 hesitant to give it -- you know, to tell me
 21 what was going on and explained to me that my
 22 mom had some dislike about the whole situation
 23 somewhat. They didn't go into detail with
 24 anything.
 25 Q. When you are referring to "the

43

1 JENINE BLACKWELL
 2 ladies," are you talking about women who are
 3 employed by --
 4 A. Dolores. It could have been
 5 anyone in this department, in that -- in that
 6 area.
 7 Q. In the --
 8 A. It could have been Dolores that
 9 day. It was -- like I said, she wasn't there
 10 at first, and then somebody else was talking to
 11 me about it and things. I can't really tell
 12 you names. I'm sorry. If you give me a name,
 13 maybe I can remember if that was what it was.
 14 But other than that --
 15 Q. When you had conversations with
 16 the ladies at the --
 17 A. Office?
 18 Q. -- DYFS, did they tell you
 19 anything about communications that your mother
 20 had with them?
 21 A. No, huh-uh. It might have been
 22 just that call, when she called them mad about
 23 the whole situation.
 24 Q. And -- and how did you come to
 25 have knowledge about that phone call?

1 JENINE BLACKWELL
 2 A. That's what I was saying; I was
 3 talking to one of the ladies.
 4 Q. So they did have a conversation
 5 with you about --
 6 A. They may have told me she called
 7 there --
 8 Q. Okay.
 9 A. -- because we were calling on
 10 the same case.
 11 Q. Okay.
 12 A. I don't think I was talking to
 13 eight different people when I called.
 14 Q. Okay.
 15 A. It was the same set of ladies
 16 there. And so they were basically -- I -- to
 17 me, I would think they would know -- have known
 18 the situation, if it was two or three of them.
 19 So that's what I'm trying to -- is --
 20 Q. I'm just trying to understand
 21 how you came to know -- how there was this
 22 unspoken understanding between you and your mom
 23 about Denine from December until May. I'm just
 24 trying to --
 25 A. I'm sorry? Unspoken?

45

1 JENINE BLACKWELL
 2 Q. Yeah.
 3 A. Everybody -- I think my mom
 4 already knew. They were telling me --
 5 Q. Unspoken between you and your
 6 mom. You said you never had any
 7 communications --
 8 A. Right.
 9 Q. -- with her --
 10 A. We didn't.
 11 Q. -- until May.
 12 A. I believe so.
 13 Q. But you also testified -- and
 14 correct me if I'm wrong --
 15 A. Okay.
 16 Q. -- that there was -- that you
 17 knew that your mom knew --
 18 A. There was a conversation with
 19 the ladies, sir. All I can say is, my mom knew
 20 that I knew, I believe. If I'm wrong, then I'm
 21 wrong.
 22 Q. Okay.
 23 A. Because there was so many things
 24 that weren't said and the letter came and
 25 then -- who initiated the letter and they

12 (Pages 42 to 45)

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<p style="text-align: right;">46</p> <p>1 JENINE BLACKWELL</p> <p>2 shouldn't -- I don't -- you know, it's a lot of</p> <p>3 stuff, you know.</p> <p>4 And so my mom -- the lady was --</p> <p>5 I think, somewhere in there, my mom must have</p> <p>6 called the ladies upset. I mean, it could have</p> <p>7 been the same phone call on the same day in the</p> <p>8 same room to the other lady. I don't -- you</p> <p>9 know, she just let me know that my mom had</p> <p>10 called there and she wasn't happy about the</p> <p>11 situation. I don't know which one it was.</p> <p>12 Q. Okay.</p> <p>13 A. I don't even know, you know,</p> <p>14 what was going on.</p> <p>15 MR. BAIRD: Okay. I have no --</p> <p>16 nothing further. Thank you.</p> <p>17 THE WITNESS: Sorry if I didn't</p> <p>18 help you-all out, but --</p> <p>19 MR. MIKULSKI: Karen, do you</p> <p>20 have anything else? I don't.</p> <p>21 MS. JORDAN: I don't. I did</p> <p>22 have one, but I can't remember it.</p> <p>23 MR. MIKULSKI: Okay. Thank you.</p> <p>24 MS. JORDAN: So that's it.</p> <p>25 Thank you.</p>	<p style="text-align: right;">48</p> <p>1 JENINE BLACKWELL</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I hereby certify that the</p> <p>5 witness was duly sworn by me and that the</p> <p>6 deposition is a true record of the testimony</p> <p>7 given by the witness.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 <u>Judi Y. Olsen, RPR</u></p> <p>12 Dated: March 11, 2010</p> <p>13</p> <p>14 (The foregoing certification of this transcript</p> <p>15 does not apply to any reproduction of the same</p> <p>16 by any means, unless under the direct control</p> <p>17 and/or supervision of the certifying shorthand</p> <p>18 reporter.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">47</p> <p>1 JENINE BLACKWELL</p> <p>2 MR. BAIRD: Thank you.</p> <p>3 * * *</p> <p>4 (Witness excused.)</p> <p>5 * * *</p> <p>6 (Whereupon, the deposition was</p> <p>7 concluded at 11:31 a.m.)</p> <p>8 * * *</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">49</p> <p>1 JENINE BLACKWELL</p> <p>2 I N S T R U C T I O N S T O W I T N E S S</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the appropriate</p> <p>6 space on the errata sheet for any corrections</p> <p>7 that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it.</p> <p>10 You are signing same subject to</p> <p>11 the changes you have noted on the errata sheet,</p> <p>12 which will be attached to your deposition.</p> <p>13 It is imperative that you return</p> <p>14 the original errata sheet to the deposing</p> <p>15 attorney within thirty (30) days of receipt of</p> <p>16 the deposition transcript by you. If you fail</p> <p>17 to do so, the deposition transcript may be</p> <p>18 deemed to be accurate and may be used in court.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

13 (Pages 46 to 49)

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JENINE BLACKWELL

ERRATA

PAGE LINE CHANGE

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JENINE BLACKWELL

ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby
certify that I have read the foregoing pages
_____ to _____ and that the same is a correct
transcription of the answers given by me to the
questions therein propounded, except for the
corrections or changes in form or substance, if
any, noted in the attached Errata Sheet.

DATE SIGNATURE

Subscribed and sworn to before me this
_____ day of _____,
2010.

My commission expires: _____

Notary Public